

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TODD JADLOW, derivatively on behalf of
SELECTQUOTE, INC.,

Plaintiff,

No. 1:22-CV-06290-AKH

v.

TIMOTHY R. DANKER, RAFFAELE SADUN,
DONALD BRITTON, EARL DEVANNY III,
DENISE DEVINE, WILLIAM GRANT II,
DONALD HAWKS III, KAVITA K. PATEL, and
RAYMOND WELDON,

Defendants,

and

SELECTQUOTE, INC.,

Nominal Defendant.

JOINT STIPULATION AND ORDER TO STAY ACTION

WHEREAS, the complaint (“Complaint”) in this action (the “Derivative Action”), brought derivatively on behalf of Nominal Defendant SelectQuote, Inc. (“SelectQuote”), was initially filed in the United States District Court for the District of Delaware;

WHEREAS, two earlier-filed securities class actions, styled *Hartel v. SelectQuote Inc. et al.*, Civil Action No. 1:21-cv-06903 (AKH) (filed August 16, 2021) and *West Palm Beach Police Pension Fund v. SelectQuote, Inc. et al.*, Civil Action No. 1:21-cv-08279 (AKH) (filed October 7, 2021) (the “Securities Class Actions”) are currently pending in this Court. The Securities Class Actions assert claims against SelectQuote and certain SelectQuote executives and directors under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and under Sections 11 and 15 of the Securities Act of 1933;

WHEREAS, on July 25, 2022, the Derivative Action was transferred to the United States District Court for the Southern District of New York;

WHEREAS, on July 25, 2022, the Derivative Action was referred to Judge Alvin K. Hellerstein as possibly related to *Hartel v. SelectQuote Inc. et al.*, one of the Securities Class Actions;

WHEREAS, on August 4, 2022, the Derivative Action was accepted as related to *Hartel v. SelectQuote Inc. et al.*;

WHEREAS, there is significant overlap between the parties, alleged facts, and circumstances at issue in the Derivative Action and the Securities Class Actions. Eight of the nine named defendants in the Derivative Action — Timothy R. Danker, Raffaele Sadun, Donald Britton, Earl Devanny II, Denise Devine, William Grant II, Donald Hawks III, and Raymond Weldon — along with Nominal Defendant SelectQuote, are also named defendants in the Securities Class Actions. The claims in the Derivative Action arise from many of the same alleged misstatements, corrective disclosures, and stock price declines pleaded in the Securities Class Actions, involve largely identical subject matters, and cover the exact same time period of May 20, 2020 to August 25, 2021 as the claims in the Securities Class Actions. In addition, certain of the claims asserted in the Derivative Action seek contribution for claims asserted in the Securities Class Actions; and

WHEREAS, in light of the significant overlap between this Derivative Action and the earlier-filed Securities Class Actions, to conserve the parties' and judicial resources, the parties to this Derivative Action agree that all proceedings and deadlines in this Derivative Action, including discovery and Defendants' obligation to answer or respond to the Complaint, should be stayed pending resolution of the forthcoming motion to dismiss the Securities Class Actions.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this Derivative Action through their undersigned counsel as follows:

1. All proceedings and deadlines in this Derivative Action, including the filing of pleadings, motion practice and any discovery, shall be stayed pending resolution of the forthcoming motion to dismiss the Securities Class Actions.

2. Subject to applicable federal or local rules, any party to this Derivative Action may cause the stay to be lifted upon thirty (30) days written notice via email to the undersigned counsel for the other party/parties, provided, however, that nothing herein shall prevent any party from moving to extend the stay notwithstanding any such notice, or from opposing any such requested extension.

3. Promptly after the entry of an order lifting the stay, the parties to this Derivative Action shall meet and confer regarding future case scheduling and will submit an update on the status of the case or a proposed scheduling stipulation for this Court's review and approval. Defendants are not required to answer or otherwise respond to the Complaint in this Derivative Action until the deadline set forth in the Court's order on the parties' proposed schedule.

4. Plaintiff may amend his complaint during the stay, although Defendants need not answer, move, or otherwise respond to the Complaint or any amended complaint.

5. Defendants expressly preserve, and do not waive, any and all rights, defenses and objections in this Derivative Action and any other matter, including but not limited to venue and failure to adequately plead demand futility.

6. Plaintiff expressly preserves, and does not waive, any and all rights and claims in this Derivative Action and any other matter, including but not limited to venue, demand futility, or alleged breach of fiduciary duties and violations of federal securities laws and other laws.

IT IS SO ORDERED:

Dated: August 10, 2022

/s/ Alvin K. Hellerstein

Hon. Alvin K. Hellerstein
United States District Judge

STIPULATED TO AND APPROVED BY:

Dated: August 8, 2022

THE BROWN LAW FIRM, P.C.

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